

Transcript of the Testimony of:
Jaclyn Matteo-Hand

Date: September 27, 2023

Case: Alvarado v. City of Philadelphia, et al

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<div>Page 1</div> <div>IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PENNSYLVANIA</div> <div>----- : FELISHATAY ALVARADO, : : : Plaintiff : June Term, : 2022 vs. : : No. 01633 CITY OF PHILADELPHIA, : ET AL, : : : Defendants : ----- : --- September 27, 2023 ---</div> <div>Remote Oral Deposition of JACLYN MATTEO-HAND, taken via Zoom conference technology, on the above date, beginning at approximately 1:00 p.m., before Dawn M. Burr, a Professional Court Reporter and Notary Public, there being present.</div> <div>--- DIAMOND COURT REPORTING 406 Redbud Lane Mantua, New Jersey 08051 (856) 589-1107 dcr.diamond@comcast.net</div>	<div>Page 3</div> <div>1 I N D E X 2 WITNESS PAGE 3 JACLYN MATTEO-HAND 4 Examination by Mr. West 4 5 Examination by Mr. Assini 28 6 7 8 EXHIBITS 9 NO. DESCRIPTION PAGE 10 Matteo-Hand-1 Home Investigation 28 Interview 28 11 Matteo-Hand-2 Client File Notes 12 13 14 15 16 17 18 19 20 21 22 23 24</div>
<div>Page 2</div> <div>1 A P P E A R A N C E S: 2 VICTIMS' RECOVERY LAW CENTER 3 BY: KEITH THOMAS WEST, ESQUIRE 4 The North American Building 5 121 South Broad Street, 18th Floor 6 Philadelphia, PA 19107 7 Counsel for the Plaintiff 8 Tel. 215-546-1433 9 E-mail: keith@victimrecoverylaw.com 10 ***** 11 CITY OF PHILADELPHIA - LAW 12 DEPARTMENT 13 BY: ADAM R. ZURBRIGGEN, ESQUIRE 14 One Parkway Building 15 1515 Arch Street 16 Philadelphia, PA 19102 17 Counsel for the Defendants 18 Tel. 215-683-5114 19 E-mail: adam.zurbruggen@phila.gov 20 ***** 21 FIRST JUDICIAL DISTRICT OF 22 PENNSYLVANIA 23 DEPUTY COURT ADMINISTRATOR CHIEF - 24 LEGAL SERVICES BY: ERIC J. ASSINI, ESQUIRE 369 City Hall Philadelphia, PA 19107 Counsel for the Witness, Jaclyn Matteo-Hand Tel. 215-686-3745 E-mail: eric.assini@courts.phila.gov *****</div>	<div>Page 4</div> <div>1 --- 2 (It was stipulated by and between 3 counsel that all objections, except as 4 to the form of the question, be reserved 5 until the time of trial.) 6 --- 7 ... JACLYN MATTEO-HAND, having 8 been duly sworn as a witness, was 9 examined and testified as follows. . . 10 --- 11 EXAMINATION 12 --- 13 BY MR. WEST: 14 Q. Ms. Matteo-Hand, my name is Keith 15 West. I'm one of the attorneys who represents the 16 plaintiff in this action, a woman by the name of 17 Ms. Alvarado. My understanding is that you are 18 with the Probation and Parole Office; is that 19 right? 20 A. Yes. 21 Q. Could you tell us what is your 22 current job position and employer? 23 A. I work for the FJD, First Judicial 24 District. I am a Probation Parole Officer II, and</div>

<p style="text-align: right;">Page 5</p> <p>1 I am working as house arrest release coordinator</p> <p>2 at this point.</p> <p>3 Q. So as part of the house release</p> <p>4 coordinator, do you actually go to the house of</p> <p>5 people who are put on probation and inspect the</p> <p>6 house trying to make sure that it fits any sort of</p> <p>7 criteria for release?</p> <p>8 MR. ASSINI: Objection to the form,</p> <p>9 but you can answer.</p> <p>10 THE WITNESS: No, I do not.</p> <p>11 BY MR. WEST:</p> <p>12 Q. Could you tell me what do you do as</p> <p>13 the home coordinator?</p> <p>14 A. I would get a contact sheet and</p> <p>15 court order from the attorney and the judge. I</p> <p>16 would call them on the phone. We complete an</p> <p>17 investigation. I complete an investigation on the</p> <p>18 computer. I hand it into our pretrial field team.</p> <p>19 They would go out and install the equipment at the</p> <p>20 residence.</p> <p>21 Q. So I think you referred to the</p> <p>22 people who would actually go out to the home</p> <p>23 as -- it cut out a little bit. Something team?</p> <p>24 A. Pretrial field team.</p>	<p style="text-align: right;">Page 7</p> <p>1 the City of Philadelphia, every time somebody is</p> <p>2 placed under house arrest, that would mean</p> <p>3 somebody from the office would have actually gone</p> <p>4 to that person's house and inspected the premises,</p> <p>5 right?</p> <p>6 MR. ASSINI: Objection to form, but</p> <p>7 you can answer to the extent --</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MR. WEST:</p> <p>10 Q. So let's -- I'm going to pull up</p> <p>11 here a document. I can represent this was</p> <p>12 e-mailed to us earlier today. Then I'll ask you</p> <p>13 if you know what it is. Can you guys see my</p> <p>14 screen here?</p> <p>15 A. Yes.</p> <p>16 Q. So we're gonna mark this as</p> <p>17 Matteo-Hand Exhibit-1. And could you tell me what</p> <p>18 this is?</p> <p>19 A. This is a home investigation</p> <p>20 interview, which I complete over the phone.</p> <p>21 Q. Okay. So you personally did this</p> <p>22 interview?</p> <p>23 A. Yes.</p> <p>24 Q. I tried to use TrialPad and it</p>
<p style="text-align: right;">Page 6</p> <p>1 Q. Could you tell me a bit more about</p> <p>2 the pretrial field team; what is that?</p> <p>3 A. They install house arrest equipment</p> <p>4 in the residence.</p> <p>5 Q. Now, is that something that needs</p> <p>6 to be done for all probations or some probations?</p> <p>7 MR. ASSINI: Objection to the form,</p> <p>8 but you can answer.</p> <p>9 THE WITNESS: Just house arrest</p> <p>10 cases, that are sentenced to house</p> <p>11 arrest.</p> <p>12 BY MR. WEST:</p> <p>13 Q. So this case involves someone named</p> <p>14 Bernard Lee. Was he put on house arrest?</p> <p>15 A. Yes.</p> <p>16 Q. And for every person who's placed</p> <p>17 under house arrest, would there need to be some</p> <p>18 people from the pretrial field team who go out and</p> <p>19 inspect their house?</p> <p>20 MR. ASSINI: Objection to form.</p> <p>21 You can answer.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. WEST:</p> <p>24 Q. So not to beat a dead horse, but in</p>	<p style="text-align: right;">Page 8</p> <p>1 wouldn't work. So I gotta do something else here.</p> <p>2 I think this might be the same thing.</p> <p>3 So I'm circling part of it in</p> <p>4 yellow and this says interview completed with</p> <p>5 Sheila Washington - mother. Is that the person</p> <p>6 that you spoke with?</p> <p>7 A. According to my notes, yes.</p> <p>8 Q. I'm just going down here. The</p> <p>9 address, I'm gonna mark that in yellow as well.</p> <p>10 That says 4664 Torresdale Avenue, rear apartment,</p> <p>11 two floors, and then it says go up alleyway to</p> <p>12 knock on door, right?</p> <p>13 A. Yes.</p> <p>14 Q. Did you write that?</p> <p>15 A. I did.</p> <p>16 Q. How would you have gotten the</p> <p>17 information on what the address was?</p> <p>18 A. When I spoke to his mother.</p> <p>19 Q. So your understanding, based on</p> <p>20 your notes, is that you spoke with his mother who</p> <p>21 represented that she lived in the same apartment</p> <p>22 and she told you that the entrance to their</p> <p>23 apartment was in the alleyway, correct?</p> <p>24 A. Yes.</p>

<p style="text-align: right;">Page 9</p> <p>1 Q. Is there anything else in 2 particular that you recall about that 3 conversation? 4 A. No. 5 Q. Okay. Do you know approximately 6 when this conversation would have happened? I see 7 also it's dated September 25th, this year, but I 8 assume that's just when you printed it out, right? 9 A. Correct. It was completed on April 10 25th, 2019. 11 Q. Okay, in April 2019. Now, our 12 lawsuit, that this case is about, is an incident 13 that occurred in 2021. Did anyone from the 14 Philadelphia Police Department ever contact you 15 asking for information about how to get to Bernard 16 Lee's homes? 17 A. No. 18 Q. If anybody from the Philadelphia 19 Police Department had contacted you asking for 20 advice on how to get to Bernard Lee's home, would 21 you have referred to these notes and let them know 22 that your records indicated that the entrance was 23 through the alleyway? 24 MR. ASSINI: Objection to form.</p>	<p style="text-align: right;">Page 11</p> <p>1 supervising this case? 2 A. No. 3 Q. Who was your supervisor back in 4 June 2021? 5 A. Duane Archie, D-U-A-N-E, Archie, 6 A-R-C-H-I-E. 7 Q. In your experience working for the 8 First Judicial District, have you ever been 9 contacted by anybody from the police department 10 asking for advice as far as how someone on 11 probation or parole could be located? 12 MR. ASSINI: Objection to form. 13 You can answer. 14 THE WITNESS: No, not that I 15 recall. 16 BY MR. WEST: 17 Q. Okay. Would the police normally 18 contact somebody in a different position in your 19 experience? 20 MR. ASSINI: Objection to form. 21 You can answer. 22 MR. ZURBRIGGEN: Joining in the 23 objection. 24 THE WITNESS: I'm not sure.</p>
<p style="text-align: right;">Page 10</p> <p>1 You can answer. 2 THE WITNESS: I'm not sure. I 3 wasn't in that position and I would 4 most likely need to ask my supervisor if 5 we're able to give that information. 6 BY MR. WEST: 7 Q. Who's your supervisor? 8 A. My supervisor? 9 Q. Yeah. 10 A. Right now is Zakia Balon. 11 Q. Who would have been your supervisor 12 back in June of 2021? 13 A. I didn't have the case in June 14 2021. 15 Q. You did not have any supervisor in 16 June 2021? 17 A. No. 18 MR. ASSINI: Hold on. No, you 19 didn't have a supervisor, or no -- 20 THE WITNESS: No. I had a 21 supervisor, but I was not supervising 22 this case. 23 BY MR. WEST: 24 Q. Okay. Are you currently</p>	<p style="text-align: right;">Page 12</p> <p>1 BY MR. WEST: 2 Q. Could you tell me a bit more about 3 your -- like what were your job duties and 4 responsibilities back in June 2021? 5 A. I was doing the same thing with the 6 house arrest release coordinations. So I was 7 placing -- getting people ready to be placed on 8 house arrest. 9 Q. So who would you create these 10 records for? 11 A. Repeat the question. 12 Q. The record that you've given us, 13 that we've marked Matteo-Hand-1, is a written 14 record of a conversation you had with Sheila 15 Washington, right? 16 MR. ASSINI: Object to the form. 17 You can answer. 18 THE WITNESS: Basically, yes. 19 BY MR. WEST: 20 Q. Why did you create this? 21 A. It's my job to create that. 22 Q. What is your understanding as to 23 why your employer asked you to make these? 24 MR. ASSINI: Objection to form.</p>

<p style="text-align: right;">Page 13</p> <p>1 You can answer.</p> <p>2 THE WITNESS: To get all the</p> <p>3 information to get defendants placed on</p> <p>4 house arrest.</p> <p>5 BY MR. WEST:</p> <p>6 Q. Who would use that information, in</p> <p>7 your experience?</p> <p>8 MR. ASSINI: Objection to form.</p> <p>9 You can answer.</p> <p>10 THE WITNESS: The pretrial field</p> <p>11 team uses it, probation officers use</p> <p>12 it.</p> <p>13 BY MR. WEST:</p> <p>14 Q. So would the information that</p> <p>15 you've written down in this exhibit be available</p> <p>16 to the probation officer?</p> <p>17 A. Yes.</p> <p>18 Q. So in theory, if someone at the --</p> <p>19 strike the question.</p> <p>20 In your experience, the way that</p> <p>21 the probation parole office is set up in the First</p> <p>22 Judicial District, if somebody were to ask the</p> <p>23 probation officer what records there where as far</p> <p>24 as where Bernard Lee lived, is it your experience</p>	<p style="text-align: right;">Page 15</p> <p>1 someone?</p> <p>2 A. Yes.</p> <p>3 Q. Who did you submit it to?</p> <p>4 A. The pretrial field team.</p> <p>5 Q. Okay. And they also would have</p> <p>6 passed that along to the probation officer, right?</p> <p>7 MR. ASSINI: Objection to the form.</p> <p>8 You can answer, if you know.</p> <p>9 MR. ZURBRIGGEN: Joining in the</p> <p>10 objection.</p> <p>11 THE WITNESS: I passed it along to</p> <p>12 the house arrest officer.</p> <p>13 BY MR. WEST:</p> <p>14 Q. I can represent that, as of June</p> <p>15 2021, Bernard Lee still had a probation officer.</p> <p>16 Would it be your understanding or expectation that</p> <p>17 the probation officer would have had documents</p> <p>18 like this in her possession, or access to it?</p> <p>19 A. I'm not sure.</p> <p>20 Q. In your experience, has there ever</p> <p>21 been a situation where the Philadelphia Police</p> <p>22 Department contacted the office that you work for</p> <p>23 asking for information about a wanted suspect and</p> <p>24 a supervisor at your office said don't talk to the</p>
<p style="text-align: right;">Page 14</p> <p>1 that the probation officer could have looked at</p> <p>2 documents like this if they wanted to find an</p> <p>3 answer to that question?</p> <p>4 MR. ASSINI: Objection to the form.</p> <p>5 You can answer.</p> <p>6 THE WITNESS: I'm not sure if this</p> <p>7 document was available in 2021 for</p> <p>8 someone to look at.</p> <p>9 BY MR. WEST:</p> <p>10 Q. Do you have any reason to believe</p> <p>11 -- I'm sorry. Did I interrupt you?</p> <p>12 A. In 2019 it was available, but he</p> <p>13 was no longer on house arrest in 2021.</p> <p>14 Q. So in 2019 it was available because</p> <p>15 that's when it was created, right?</p> <p>16 A. Right.</p> <p>17 Q. And it must be available now</p> <p>18 because you just obtained it a couple days ago,</p> <p>19 right?</p> <p>20 A. Yes, on my computer.</p> <p>21 Q. And besides saving it on your</p> <p>22 computer, did you save it somewhere else?</p> <p>23 A. I personally -- no, I did not.</p> <p>24 Q. Did you submit this paperwork to</p>	<p style="text-align: right;">Page 16</p> <p>1 police?</p> <p>2 MR. ASSINI: Objection to the form.</p> <p>3 You can answer to what you know.</p> <p>4 THE WITNESS: I've never spoken to</p> <p>5 a police office about a suspect.</p> <p>6 BY MR. WEST:</p> <p>7 Q. I'm just asking because you said</p> <p>8 that before you spoke to a police officer you'd</p> <p>9 have to ask for a supervisor to approve that? I'm</p> <p>10 just wondering is there anything in your</p> <p>11 experience, or anything you've ever heard, that</p> <p>12 would lead you to believe that a supervisor would</p> <p>13 ever even consider saying, hey, don't tell the</p> <p>14 police where that guy is?</p> <p>15 A. I have no idea.</p> <p>16 Q. But is it fair to say that you've</p> <p>17 never had any experience that would lead you to</p> <p>18 believe that a supervisor would ever deny a</p> <p>19 request like that?</p> <p>20 MR. ASSINI: Objection to form, but</p> <p>21 you can answer.</p> <p>22 MR. ZURBRIGGEN: Join.</p> <p>23 THE WITNESS: I have no idea. I'm</p> <p>24 not a supervisor.</p>

<p style="text-align: right;">Page 17</p> <p>1 BY MR. WEST:</p> <p>2 Q. Okay. Do you know if this document</p> <p>3 was saved in Bernard Lee's probation folder?</p> <p>4 MR. ASSINI: Objection to the form,</p> <p>5 but you can answer to the extent you</p> <p>6 understand the question.</p> <p>7 THE WITNESS: It may have been. I</p> <p>8 can't say for sure.</p> <p>9 BY MR. WEST:</p> <p>10 Q. Is that -- could you look up that</p> <p>11 folder now and check if it's in there?</p> <p>12 A. Can I?</p> <p>13 Q. Yeah.</p> <p>14 MR. ASSINI: Not from here. We're</p> <p>15 in my office and I don't have access</p> <p>16 to that.</p> <p>17 BY MR. WEST:</p> <p>18 Q. Okay. But is that something you</p> <p>19 would normally have access to?</p> <p>20 A. Yes, if I was at my office, sure.</p> <p>21 Q. Based on your understanding of the</p> <p>22 policies and practices of your employer, would</p> <p>23 there be any reason why this document wouldn't be</p> <p>24 in his probation folder?</p>	<p style="text-align: right;">Page 19</p> <p>1 we put all of our notes in.</p> <p>2 Q. Is this something that the</p> <p>3 probation officer would normally have access to?</p> <p>4 A. Yes.</p> <p>5 Q. I can represent to you this is for</p> <p>6 Bernard Lee. I don't know if you can see that,</p> <p>7 but it says Bernard Lee on it, okay. This was</p> <p>8 produced to us by Ms. Shannon, the probation</p> <p>9 officer, when she was deposed earlier. I'll just</p> <p>10 scroll down here to -- I highlighted something. I</p> <p>11 don't know why the highlighting is not showing up.</p> <p>12 So I'll just do it again. I apologize. I</p> <p>13 premarked this, but it didn't come through for</p> <p>14 some reason. So I will use a highlighting tool.</p> <p>15 Can you see that I've highlighted</p> <p>16 part of this page?</p> <p>17 A. Yes.</p> <p>18 Q. It says April 26th, 2019,</p> <p>19 completed, and it says Matteo J. Is that you?</p> <p>20 A. Yes.</p> <p>21 Q. And it says author. Does that mean</p> <p>22 that you wrote this?</p> <p>23 A. Yes.</p> <p>24 Q. And it says field team installed</p>
<p style="text-align: right;">Page 18</p> <p>1 MR. ASSINI: Objection to the form,</p> <p>2 but you can answer to the extent you</p> <p>3 know.</p> <p>4 THE WITNESS: I guess it should</p> <p>5 have been. I don't really know. I</p> <p>6 didn't have the file.</p> <p>7 MR. WEST: All right. Let me --</p> <p>8 I'm gonna stop sharing for just a moment</p> <p>9 to pull up another document. Can you</p> <p>10 guys see the document I'm sharing?</p> <p>11 MR. ASSINI: Yes.</p> <p>12 BY MR. WEST:</p> <p>13 Q. So this document has been</p> <p>14 previously marked as Shannon Exhibit-1. We're</p> <p>15 also gonna mark the same document as Matteo-Hand</p> <p>16 Exhibit-2. Just for the record, it says Client</p> <p>17 File Notes at the top. Do you recognize what this</p> <p>18 is generally? Is this the kind of document you've</p> <p>19 seen before?</p> <p>20 A. Yes.</p> <p>21 Q. Can you tell me, in your</p> <p>22 experience, generally what are documents like this</p> <p>23 used for?</p> <p>24 A. That's our monitor. That's where</p>	<p style="text-align: right;">Page 20</p> <p>1 PHMU. Can you tell us what PHMU would stand for</p> <p>2 in this context?</p> <p>3 A. Sure. It's the house arrest box.</p> <p>4 Q. And it says location: second floor</p> <p>5 apartment, rear entrance off Margaret Street,</p> <p>6 right?</p> <p>7 A. Yes.</p> <p>8 Q. So is this you memorializing that</p> <p>9 -- so that everyone in your office would know that</p> <p>10 the entrance to Mr. Lee's apartment was off</p> <p>11 Margaret Street?</p> <p>12 MR. ASSINI: Objection to form.</p> <p>13 You can answer.</p> <p>14 THE WITNESS: Yes. This was copied</p> <p>15 from pretrial field team notes and put</p> <p>16 into our notes so everyone would know.</p> <p>17 BY MR. WEST:</p> <p>18 Q. So any of the people involved with</p> <p>19 Bernard Lee's case at the probation office, if</p> <p>20 they were contacted and asked hey, do you have any</p> <p>21 information on how to get into Bernard Lee's</p> <p>22 apartment, they could have pulled this up and</p> <p>23 said, yeah, you gotta go in the rear entrance off</p> <p>24 Margaret Street, right?</p>

<p style="text-align: right;">Page 21</p> <p>1 MR. ASSINI: Objection to the form.</p> <p>2 You can answer.</p> <p>3 MR. ZURBRIGGEN: I'm joining in the</p> <p>4 objection.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. WEST:</p> <p>7 Q. I understand that you personally</p> <p>8 haven't had the experience of speaking with</p> <p>9 anybody from the police department about how to</p> <p>10 find a suspect who's on probation, but I'm just</p> <p>11 asking generally, in your experience, do you know</p> <p>12 if the police contact other people in your office</p> <p>13 to ask for that kind of information?</p> <p>14 A. They could, I guess. I don't know</p> <p>15 of any.</p> <p>16 Q. I don't know what kind of briefing</p> <p>17 you might get from you're employer. So you're not</p> <p>18 really aware if the probation officers are asked</p> <p>19 that sort of question or not?</p> <p>20 MR. ASSINI: Objection.</p> <p>21 THE WITNESS: No. Sorry.</p> <p>22 MR. WEST: That's fine.</p> <p>23 BY MR. WEST:</p> <p>24 Q. Is there any policy in your office,</p>	<p style="text-align: right;">Page 23</p> <p>1 Q. Is there anything else at this time</p> <p>2 that you recall about the Bernard Lee case? Did</p> <p>3 you ever have any unusual interactions with him,</p> <p>4 maybe not the police, but anyone else? Is there</p> <p>5 anything else that you recall at this time about</p> <p>6 the Bernard Lee case?</p> <p>7 A. No.</p> <p>8 Q. I think you indicated he was off</p> <p>9 house arrest at some point. Do you know when he</p> <p>10 would have been off house arrest?</p> <p>11 A. He actually absconded in July of</p> <p>12 2019.</p> <p>13 Q. Can you tell me more about that?</p> <p>14 A. He absconded. So he left. I'm not</p> <p>15 sure if he cut off his bracelet or whatever, but</p> <p>16 he was no longer reporting. We didn't know where</p> <p>17 he was. There was a warrant out for him.</p> <p>18 Q. So between July of 2019 and up</p> <p>19 until at least June of 2021, from your office's</p> <p>20 point of view, was Bernard Lee's whereabouts</p> <p>21 unknown?</p> <p>22 MR. ASSINI: October to the form,</p> <p>23 but you can answer to the extent you</p> <p>24 can.</p>
<p style="text-align: right;">Page 22</p> <p>1 that you're aware of, that would give anyone any</p> <p>2 reason to believe that supervisors in your office</p> <p>3 would ever instruct anybody in your office, you</p> <p>4 know, hey, don't tell the police where these guys</p> <p>5 are?</p> <p>6 MR. ASSINI: Objection to the form.</p> <p>7 You can answer.</p> <p>8 THE WITNESS: Not in my</p> <p>9 recollection. I would need to review</p> <p>10 policy.</p> <p>11 MR. ZURBRIGGEN: I'm joining in the</p> <p>12 objection, just for the record.</p> <p>13 BY MR. WEST:</p> <p>14 Q. All right. In any case, if</p> <p>15 somebody did contact your office and the records</p> <p>16 were pulled, your office's records clearly showed</p> <p>17 that the entrance to Bernard Lee's apartment was</p> <p>18 the rear entrance off Margaret Street, correct?</p> <p>19 MR. ASSINI: Objection to the form.</p> <p>20 You can answer.</p> <p>21 MR. ZURBRIGGEN: I'm joining in the</p> <p>22 objection.</p> <p>23 THE WITNESS: Correct.</p> <p>24 BY MR. WEST:</p>	<p style="text-align: right;">Page 24</p> <p>1 THE WITNESS: To my knowledge,</p> <p>2 eventually he was found, yes.</p> <p>3 BY MR. WEST:</p> <p>4 Q. Can you tell me about when he was</p> <p>5 found?</p> <p>6 A. May of 2020.</p> <p>7 Q. And where was he found?</p> <p>8 A. That I do not know.</p> <p>9 Q. Once he was found, was he taken</p> <p>10 back to prison, jail, was he put back on house</p> <p>11 arrest?</p> <p>12 A. He was taken to prison.</p> <p>13 Q. Do you know how long he was taken</p> <p>14 back to prison for?</p> <p>15 A. I think his detainer was lifted in</p> <p>16 June of 2020.</p> <p>17 Q. Okay. So only a month?</p> <p>18 A. Yeah, with no house arrest.</p> <p>19 Q. All right. I've definitely heard</p> <p>20 of worst fates for absconding, but okay.</p> <p>21 So then between June of 2020 and</p> <p>22 June of 2021, do you know what his status was; was</p> <p>23 he on house arrest, something else?</p> <p>24 A. This is all according to the</p>

<p style="text-align: right;">Page 25</p> <p>1 notes.</p> <p>2 Q. Okay.</p> <p>3 A. He was not on house arrest. He was</p> <p>4 -- I assume he was reporting to a probation</p> <p>5 officer.</p> <p>6 MR. ASSINI: Do you know that for</p> <p>7 sure?</p> <p>8 THE WITNESS: No, I don't know that</p> <p>9 for sure. I didn't read every note. I</p> <p>10 just read my part of the notes.</p> <p>11 BY MR. WEST:</p> <p>12 Q. So as of June 2021, is it your</p> <p>13 understanding that Bernard Lee was under probation</p> <p>14 and was supposed to be reporting to a probation</p> <p>15 officer?</p> <p>16 A. June of -- I believe so, yes.</p> <p>17 Q. I don't want to take up more of</p> <p>18 your time and this is a little bit outside, but I</p> <p>19 think I have to ask the question in case I'm</p> <p>20 missing something.</p> <p>21 To me it seems a little strange</p> <p>22 that he would be on house arrest, abscond, and</p> <p>23 then be released to what seems like a lower level</p> <p>24 of supervision. Do you have any insight in the</p>	<p style="text-align: right;">Page 27</p> <p>1 Q. Just the last question. So the two</p> <p>2 exhibits that we've looked at, these are things</p> <p>3 that, in your experience, would have been</p> <p>4 available back in June 2020, correct?</p> <p>5 A. Yes.</p> <p>6 MR. WEST: I have no further</p> <p>7 questions for you. Thank you for taking</p> <p>8 a little bit of your time.</p> <p>9 THE WITNESS: Thank you.</p> <p>10 MR. ZURBRIGGEN: I have no</p> <p>11 questions for you. I just need to</p> <p>12 designate on the record those portions</p> <p>13 of this deposition mentioning Bernard</p> <p>14 Lee's name be designated confidential</p> <p>15 pursuant to the protective order.</p> <p>16 MR. WEST: I have no objection to</p> <p>17 that.</p> <p>18 MR. ZURBRIGGEN: Thank you very</p> <p>19 much for your time.</p> <p>20 MR. ASSINI: I just have brief</p> <p>21 questions.</p> <p>22 ---</p> <p>23 EXAMINATION</p> <p>24 ---</p>
<p style="text-align: right;">Page 26</p> <p>1 records of why that might have been?</p> <p>2 MR. ASSINI: Objection to form, but</p> <p>3 you can -- if you have any insight.</p> <p>4 THE WITNESS: I'm gonna say it was</p> <p>5 COVID.</p> <p>6 BY MR. WEST:</p> <p>7 Q. Okay. They just didn't have a lot</p> <p>8 of room in jail, right, probably? I mean we're</p> <p>9 guessing.</p> <p>10 MR. ASSINI: I just want to -- for</p> <p>11 the record, it's not the PO's</p> <p>12 determination in any way. It's up to a</p> <p>13 judge.</p> <p>14 BY MR. WEST:</p> <p>15 Q. I'm just saying you don't see</p> <p>16 anything in the record that like says they</p> <p>17 pardoned him of some crime or something. There's</p> <p>18 nothing in there to explain why he would be lower</p> <p>19 level, right, other than possible just scarcity?</p> <p>20 MR. ASSINI: Objection to the form,</p> <p>21 but you --</p> <p>22 MR. WEST: Okay. I don't need her</p> <p>23 to go into that.</p> <p>24 BY MR. WEST:</p>	<p style="text-align: right;">Page 28</p> <p>1 BY MR. ASSINI:</p> <p>2 Q. Do you have any independent memory</p> <p>3 of Bernard Lee?</p> <p>4 A. No.</p> <p>5 Q. So your memory is based off of your</p> <p>6 review of the file notes that are offered as an</p> <p>7 exhibit and the report also offered as an exhibit</p> <p>8 today?</p> <p>9 A. Absolutely.</p> <p>10 MR. ASSINI: No further questions.</p> <p>11 ---</p> <p>12 (Whereupon, Exhibits Matteo-Hand-1</p> <p>13 and Matteo-Hand-2 were marked for</p> <p>14 identification.)</p> <p>15 ---</p> <p>16 (Whereupon, the deposition</p> <p>17 concluded at 1:30 p.m.)</p> <p>18 ---</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

CERTIFICATION

I, DAWN M. BURR, hereby certify
that the foregoing is a true and correct
transcript transcribed from the stenographic notes
taken by me on Wednesday, September 27, 2023.



DAWN M. BURR
Shorthand Reporter

(This certification does not apply
to any reproduction of this transcript, unless
under the direct supervision of the certifying
reporter.)

ACKNOWLEDGEMENT OF DEPONENT

I, JACLYN MATTEO-HAND, do hereby
certify that I have read the foregoing pages,
_____, and that the same is a correct
transcript of the answers given by me to the
questions therein propounded, except for the
corrections or changes in form or substance, if
any, noted in the attached Errata Sheet.

DATE SIGNATURE

E R R A T A

PAGE LINE CHANGE

SUBSCRIBED AND SWORN TO BEFORE ME THIS
____ DAY OF _____, 2023.
My Commission expires: _____
Notary Public

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